

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA)	CRIMINAL NO. 2:18cr 106
)	
v.)	15 U.S.C. § 645(a)
)	Making a false statement to the
SAMUEL CARAGAN,)	Small Business Administration
)	
Defendant.)	

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

In or about July 2014, in the Eastern District of Virginia, SAMUEL CARAGAN, the defendant, made a statement to the Small Business Administration, knowing it to be false, for the purposing of influencing the action of the Administration, in violation of Title 15, United States Code, Section 645(a), in that:

1. The defendant, SAMUEL CARAGAN, is the nominal owner of a Virginia Beach company, Firm C, whose primary business is selling products to government customers.
2. In or about July 2014, the defendant reviewed and signed a letter that was delivered to the Small Business Administration relating to the eligibility of Firm C for set-aside contracts awarded under the Section 8(a) business development program.
3. The aforesaid letter contained a statement that “Samuel M. Caragan is responsible for day-to-day management of [Firm C].”
4. Caragan reviewed the letter to the Administration and certified that it was “true and accurate.” He also certified that he understood that the Administration was “relying on this information in making its determination of [Firm C’s] eligibility for the 8(a) [business

development] program.”

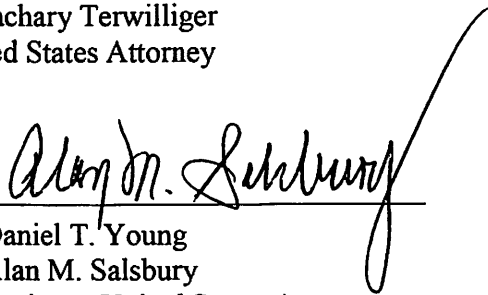
5. As the defendant well knew when he reviewed and signed the letter, the aforesaid statement was materially false in that, at the time the letter was written, CARAGAN did not control Firm C’s finances, strategy, mission, hiring, firing, contracting, or operations, and was not in any meaningful sense “responsible for [its] day-to-day management.”

6. The defendant, CARAGAN, made the false statement in the July 2014 letter for the purpose of influencing the Administration’s determination about Firm C’s continuing eligibility for the 8(a) program.

(All in violation of Title 15, United States Code, Section 645(a).)

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